

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 15-10322-PBS
)	
SHANE GUNN)	

MOTION TO EXTEND DATE OF VOLUNTARY SURRENDER

Defendant, Shane Gunn, respectfully moves this court to extend by six weeks - to July 7, 2016 - the date upon which he must report to the custody of the Bureau of Prisons ("BoP"). As reasons therefore, defendant states the following:

1. Gunn is currently under order to report on May 19, 2016. The United States Marshals Service ("USM") has informed Gunn that he has been designated to the Satellite Prison Camp at FCI Memphis.
2. As the Presentence Report documents, Gunn is married with two teenaged children. One of the children, his daughter, is a competitive gymnast. The Gunns elected to homeschool their daughter for the past academic year in order to facilitate her training regimen (which requires 26 hours a week) and competition schedule. Gunn bears the responsibility for insuring that the homeschooling requirements are completed.

3. Gunn's daughter's competitive gymnastics season ends shortly. Once the season ends and his daughter's schedule permits, Gunn and his daughter must dedicate significant time to completing the academic year's requirements. Gunn's best estimate is that with persistence the coursework can be completed by early July.
4. Gunn's wife Kelly is unable to immediately assume the homeschooling responsibilities that Gunn has borne over the past year because she is now, and will be for the next several years, the sole breadwinner for the family. Consequently, she must dedicate the vast bulk of her waking hours to running her business and cannot presently spend the time necessary to homeschool the couple's daughter.
5. Defendant has been reporting to Pretrial Services in the Middle District of Tennessee as directed and is in full compliance with all of his conditions of release. Should the Court allow this Motion, defendant will continue to report as directed until self-surrendering.

Wherefore, defendant respectfully requests that the Court extend the time for defendant's voluntary surrender to the BoP for service of his sentence to July 7, 2016.

SHANE GUNN
By His Attorney,

/s/ Timothy Watkins
Timothy G. Watkins
Federal Defender Office
51 Sleeper St., Fifth Floor
Boston, MA 02210
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on May 4, 2016.

/s/ Timothy G. Watkins
Timothy G. Watkins